

BEFORE THE PUBLIC SERVICE COMMISSION

SOUTHEAST TELEPHONE, INC.)	
Complainant,)	
v.)	No. 2003-00105
BELLSOUTH TELECOMMUNICATIONS, INC.,)	
Defendant.)	

MOTION FOR EMERGENCY RELIEF

Comes now Complainant, Southeast Telephone, Inc., by and through counsel, and hereby moves this Honorable Commission to grant Complainant's request for emergency relief set forth in its Complaint filed herein.

On March 14, 2003, Southeast Telephone, Inc., filed a Complaint regarding BellSouth's Land-to-Mobile calling policy requiring 11-digit dialing for certain calls to cellular telephones and pagers in many of its areas. A copy of that Complaint was mailed to counsel for BellSouth on that date.

One week later, the Commission acknowledged receipt of the Complaint, and on March 27 ordered BellSouth to answer or comply within ten (10) days. To date, no response has been filed by BellSouth.

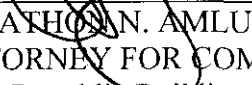
The Complaint in this action requested Emergency Relief from the Commission. The policy implemented by BellSouth has resulted in chaotic response from numerous consumers in Kentucky. Southeast Telephone has been faced with hundreds of angry and confused customers, some of whom are unable to place calls to mobile phones or pagers. Others are incurring long-distance charges for calls from their homes to local mobile

phones. As outlined in the Complaint, there are potentially imminent and disastrous consequences to BellSouth's policy.

Southeast Telephone moves this Commission to enter an Order granting immediate emergency relief from BellSouth's 11-digit land-to-mobile dialing policy. BellSouth should be compelled to remove that requirement, temporarily reverting to 7-digit land-to-mobile dialing or 10-digit land-to-mobile dialing until after a hearing is held or compromise reached in this case resulting in a permanent solution to this problem.

Dated at Louisville, Kentucky, this 23rd day of April, 2003.

Respectfully submitted,



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CERTIFICATION

I hereby certify that a true and correct copy of the foregoing was mailed, postage pre-paid, this the 23rd day of April, 2003, to:

Ms. Dorothy Chambers
BellSouth Telecommunications, Inc.
601 W. Chestnut Street
Louisville, KY 40203



JONATHON N. AMLUNG (KBA#86892)